

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTEN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CASE NO. 1:19 CV 285-MR-WCM**

BRO T. HESED-EL,	)	
	)	
	)	<b>MOTION FOR LEAVE TO FILE</b>
Plaintiff,	)	<b>AMENDED SUPPLEMENTAL</b>
	)	<b>MEMORANDUM BY DEFENDANTS</b>
vs.	)	<b>ROBIN BRYSON AND</b>
	)	<b>MISSION HOSPITAL, INC.</b>
JOHN DOE, et. al.,	)	
	)	
Defendants.	)	

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Defendants Robin Bryson and Mission Hospital, Inc. (herein “these Defendants”) file this Motion For Leave To File Amended Supplemental Memorandum By Defendants Robin Bryson And Mission Hospital, Inc. (“this Motion”) and move the Court for an Order allowing them to file an Amended Supplemental Brief regarding the applicability of the Rooker-Feldman Doctrine.

In support of this Motion, these Defendants show onto the Court the following:

1. Until the undersigned yesterday received and reviewed the Plaintiff’s Motion To Strike [Document 47] these Defendants’ Supplemental Brief regarding the Rooker-Feldman Doctrine, he had failed to realize that he had, in fact, violated the terms of this Court’s Order dated May 21, 2020 (the “Order”), by submitting an initial Supplemental Brief [Document 44] in excess of five pages.
2. The undersigned’s violation of the Order was solely a result of the having failed to review the Order prior to filing said Supplemental Brief on June 11, 2020. While undeniably stupid, the undersigned’s violation was inadvertent. It was in no way done

willfully or in stubborn disregard for this Court, as suggested by the Plaintiff's Motion To Strike.

3. The undersigned's violation will not cast a cloud of confusion in this action, as also suggested by the Plaintiff. Instead, the interests of justice would be better served by allowing this requested amendment than by striking these Defendants' initial Supplemental Brief.
4. The Court has rendered no decision regarding Rooker-Feldman, and no prejudice will come to the Plaintiff by allowing this amendment.
5. The undersigned attaches hereto "Exhibit A" the proposed Amended Supplemental Brief. The amendments are comprised solely of deletions and a few changes to transitional language to grammatically accommodate those deletions. The proposed Amended Supplemental Brief contains no assertions, citations or arguments not in these Defendants' initial Supplemental Brief.
- 6.

Respectfully submitted this the 18<sup>th</sup> day of June, 2020.

/ s/ Richard S. Daniels  
N.C. Bar No. 8716  
*Attorney for Defendants Robin Bryson and*  
*Mission Hospital, Inc.*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 18, 2020, I served the foregoing by electronically filing same with the Clerk of Court using the CM/ECF system and by depositing a copy, contained in a first-class postage-paid wrapper, into a depository under the exclusive care and custody of the United States Postal Service, addressed as follows:

**Bro. T. Hesed-El  
c/o Taqi El Agabey Mgmt.  
30 N. Gould Street, Suite R  
Sheridan, WY 82801**

A courtesy copy is also being sent via email, at Plaintiff's request, to: teamwork3@gmail.com.

This the 18<sup>th</sup> day of June, 2020.

/ s/ Richard S. Daniels  
N.C. Bar No. 8716  
*Attorney for Defendants Robin Bryson and  
Mission Hospital, Inc.*